

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WILLIAM S. MEYERS, individually and on  
behalf of the marital community comprising  
WILLIAM S. MEYERS and BONNIE A.  
MEYERS,

Plaintiffs,

vs.

PROPERTY & CASUALTY INSURANCE  
COMPANY OF HARTFORD, a foreign  
insurance company,

Defendant.

No.

**NOTICE OF REMOVAL  
OF CIVIL ACTION**

**(King County Superior Court Cause No.  
12-2-27153-4)**

TO: Judges and Clerk of the United States District Court in and for the Western  
District of Washington;

AND TO: Plaintiffs and their counsel.

Defendant in the above-captioned case, Property & Casualty Insurance Company of  
Hartford ("Hartford") hereby removes this action to this Court from the Superior Court of  
Washington, for King County, pursuant to 28 U.S.C. § 1332(a) and 28 U.S.C. § 1446.  
Defendant Hartford further states as follows:

1           1.     **State Court Action:** Hartford is the defendant in a civil action filed in the  
2 Superior Court of Washington for King County, entitled *Meyers v. Property & Casualty Ins.*  
3 *Co. of Hartford*, King County Cause No. 12-2-27153-4.

4           2.     The state court action was commenced (though not perfected) on or about  
5 August 14, 2012, when plaintiffs' Summons and Complaint were filed with the Clerk of the  
6 Superior Court of the State of Washington, in King County. Service was initiated on Hartford  
7 when the Summons and Complaint were served on the Washington State Insurance  
8 Commissioner on or about August 16, 2012.

9           3.     **Record in State Court:** See accompanying Verification Re: Filing of State  
10 Court Proceeding.

11          4.     The above-entitled action is a civil action seeking declaratory relief and  
12 damages for violation of the Washington Insurance Fair Conduct Act, violation of the  
13 Washington Consumer Protection Act, and negligence.

14          5.     Plaintiffs are residents of the State of Washington.

15          6.     Hartford is a corporation organized under the laws of the State of Indiana and  
16 domiciled in Indianapolis, Indiana.

17          7.     The amount in controversy in the above-entitled action, exclusive of interest and  
18 costs, exceeds Seventy-Five Thousand Dollars (\$75,000).

19          8.     This Notice of Removal was filed within 30 days after service of the Summons  
20 and Complaint upon Hartford.

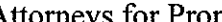
21          9.     This Court has original jurisdiction over the above-entitled action pursuant to 28  
22 U.S.C.A. § 1332, based upon diversity of citizenship and amount in controversy. This action  
23 may therefore be removed to this Court pursuant to 28 U.S.C.A. § 1441(8).

10. **Concurrent Notice to State Court:** Hartford is concurrently filing a copy of this Notice of Removal with the Clerk of the Superior Court of the State of Washington for King County, in accordance with 28 U.S.C.A. § 1446(d).

WHEREFORE, Property & Casualty Insurance Company of Hartford respectfully requests that this cause be removed to the United States District Court for the Western District of Washington.

DATED this 28 day of August, 2012.

FORSBERG & UMLAUF, P.S.

By:   
 John P. Hayes, WSBA #21009  
 Matthew S. Adams, WSBA #18820  
 Attorneys for Property & Casualty Company  
 of Hartford

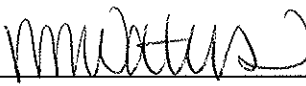
**CERTIFICATE OF SERVICE**

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On the date given below I caused to be served the foregoing **NOTICE OF REMOVAL OF CIVIL ACTION** on the following individuals in the manner indicated:

Robert A. Meyers  
Wright A. Noel  
Carson & Noel, PLLC  
20 Sixth Ave. NE  
Issaquah, WA 98027-3428  
(X) Via ECF

**SIGNED** this 5<sup>th</sup> day of September, 2012, at Seattle, Washington.

  
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Veronica M. Waters